# Case 3:07-md-01827-SI Document 6091 Filed 07/06/12 Page 1 of 5

Christopher M. Curran (pro hac vice) Email: ccurran@whitecase.com Martin M. Toto (pro hac vice) Email: mtoto@whitecase.com John H. Chung (pro hac vice) Email: jchung@whitecase.com WHITE & CASELLP 1155 Avenue of the Americas New York, NY 10036 Telephone: (212) 819-8200 Facsimile: (212) 354-8113  Attorneys for Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc.	
NORTHERN DISTRIC	Γ OF CALIFORNIA
IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to Individual Case No. 3:10-cv-05616-SI (N.D. Cal.).  SONY ELECTRONICS INC. AND SONY COMPUTER ENTERTAINMENT AMERICA LLC,  Plaintiffs,  v.  LG DISPLAY CO., LTD., et al.,  Defendants.	Master File No. M:07-1827 SI MDL No. 1827 Individual Case No.: 3:10-cv-05616-SI STIPULATION AND [PROPOSED] ORDER REGARDING TIME TO RESPOND TO CONSOLIDATED COMPLAINT
	Email: ccurran@whitecase.com Martin M. Toto (pro hac vice) Email: mtoto@whitecase.com John H. Chung (pro hac vice) Email: jchung@whitecase.com WHITE & CASEUP 1155 Avenue of the Americas New York, NY 10036 Telephone: (212) 819-8200 Facsimile: (212) 354-8113  Attorneys for Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc.  UNITED STATES D NORTHERN DISTRIC SAN FRANCISC  IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to Individual Case No. 3:10-cv-05616-SI (N.D. Cal.).  SONY ELECTRONICS INC. AND SONY COMPUTER ENTERTAINMENT AMERICA LLC, Plaintiffs,  V.  LG DISPLAY CO., LTD., et al.,

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO CONSOLIDATED COMPLAINT

1

2

3

4

5

67

8

10

1112

13

1415

1617

18

1920

21

2223

24

25

26

27

28

### **STIPULATION**

WHEREAS Sony Electronics Inc. and Sony Entertainment America LLC (collectively, "Sony") filed a Complaint naming Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc. (collectively, the "Toshiba Entities") as defendants in Case No. 3:12-cv-1596 SI (N.D. Cal.) on March 29, 2012;

WHEREAS on May 10, 2012, Sony and the Toshiba Entities filed a stipulation pursuant to which the allegations against the Toshiba Entities would be incorporated into a Consolidated Complaint in a previously-filed action, Case No. 3:10-cv-05616 SI (N.D. Cal.), and the Court approved that stipulation on May 14, 2012.

WHEREAS the May 14, 2012 stipulation and order entered by the Court set the deadline for the Toshiba Entities to respond to the Consolidated Complaint to June 25, 2012;

WHEREAS the Sony and the Toshiba Entities filed a stipulation on June 25, 2012 extending the time for the Toshiba Entities to respond to Sony's Consolidated Complaint until July 2, 2012;

WHEREAS the Toshiba Entities desire additional time to respond to Sony's Consolidated Complaint;

WHEREAS extending the Toshiba Entities' time to respond to Sony's Consolidated Complaint will not alter the date of any other event or deadline already fixed by the Court;

THEREFORE, Sony and the Toshiba Entities, by their respective counsel, stipulate and agree as follows:

- 1. The deadline for the Toshiba Entities to respond to Sony's Consolidated Complaint is extended to July 4, 2012.
- 2. This stipulation does not constitute a waiver by any of the Toshiba Entities of any substantive or procedural defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction and improper venue.

# Case 3:07-md-01827-SI Document 6091 Filed 07/06/12 Page 3 of 5

1	3. This stipulation shall not be used by any Party in support of or opposition to any		
2	arguments related to scheduling in this matter.		
3	IT IS SO STIPULATED.		
4	Dated: July 3, 2012	Respectfully submitted,	
5		WHITE & CASE LLP	
6			
7		By: /s/ John H. Chung Christopher M. Curran (pro hac vice)	
8		Email: ccurran@whitecase.com Martin M. Toto (pro hac vice)	
9		Email: mtoto@whitecase.com John H. Chung (pro hac vice) Email: ichung@whitecase.com	
10		Email: jchung@whitecase.com WHITE & CASELLP	
11		1155 Avenue of the Americas New York, NY 10036	
12		Telephone: (212) 819-8200 Facsimile: (212) 354-8113	
13		Attorneys for Toshiba Corporation, Toshiba Mobile Display Co., Ltd.,	
14		Toshiba America Electronic Components, Inc., and Toshiba	
15		America Information Systems, Inc.	
16		BRYAN CAVE LLP	
17		DICTAIN CANE LLI	
18		By: /s/ Richard Mooney Richard Mooney	
19		Margaret Branick-Abilla	
20		Robert L. Stolebarger BRYAN CAVE LLP	
21		560 Mission Street, 25th Floor San Francisco, CA 94105-2994	
22		Tel: (415) 268-2000 Fax: (415) 268-1999	
23		Attorneys for Plaintiffs Sony Electronics Inc. and Sony Computer Entertainment LLC	
24		20.1, 20.1,	
25			
26			
27			
28			

# Case 3:07-md-01827-SI Document 6091 Filed 07/06/12 Page 4 of 5

1	[PROPOSED] ORDER	
2	Having considered the foregoing stipulation, and for good cause appearing,	
3	IT IS SO ORDERED.	
4		
5	Dated: July 5	
6	The Honorable Susan Illston United States District Judge	
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

### Case 3:07-md-01827-SI Document 6091 Filed 07/06/12 Page 5 of 5

1	ATTESTATION PURSUANT TO GENERAL ORDER 45		
2	I, John H. Chung, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the		
3	concurrence to the filing of this document has been obtained from each signatory hereto.		
4	Dated: July 3, 2012 By: <u>/s/ John H. Chung</u> John H. Chung		
5	John H. Chung		
6			
7			
8			
9			
10			
11			
12			
13			
۱4			
15			
16			
١7			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			